

# Exhibit B

14101311222019  
PYSPTCambria County Prothonotary  
Civil Case Detail ReportPage 1  
11/22/2019

Case No. .... 2019-02921 DANNY DAVID (vs) THE PA STATE UNIVERSITY

Reference No. ....  
Case Type. .... CONTRACT - EMPLOYMENT  
Judgment. .... \$.00  
Judge Assigned. ....  
Disposed Desc. ....Filed. .... 6/19/2019  
Time. .... 9:14  
Execution Date. .... 0/00/0000  
Jury Trial. ....  
Disposed Date.. .... 0/00/0000  
Higher Crt 1...  
Higher Crt 2...

----- Case Comments -----

\*\*\*\*\*  
++ GENERAL INDEX ++Indexed Party  
DAVID DANNY

PLAINTIFF

Attorney InfoCOLEMAN MARGARET S  
2103 INVESTMENT BUILDING  
239 FOURTH AVENUE  
PITTSBURGH, PA 15219THE PENNSYLVANIA STATE  
UNIVERSITY

DEFENDANT

SNYDER JOHN A ESQ  
811 UNIVERSITY DRIVE  
STATE COLLEGE, PA 16801\*\*\*\*\*  
++ DOCKET ENTRIES ++

Date	Entry Text
6/19/2019	----- FIRST ENTRY ----- PRAECIPE TO ISSUE WRIT OF SUMMONS FILED. (WRIT OF SUMMONS ISSUED TO MARGARET S. COLEMAN, ESQ.) 10 Image page(s) exists for this entry
10/30/2019	COMPLAINT IN CIVIL ACTION FILED BY MARGARET S. COLEMAN, ESQ. 8 Image page(s) exists for this entry
11/14/2019	PRAECIPE FOR ENTRY OF APPEARANCE ON BEHALF OF DEFENDANT, FILED BY JOHN A. SNYDER, ESQ. 5 Image page(s) exists for this entry
	----- LAST ENTRY -----

\*\*\*\*\*

Cost / Fee	++ Escrow Information ++		End. Balance
	Beg. Balance	Pymts/Adjmts	
WRIT OF SUMMONS	\$57.50	\$57.50	\$0.00
SUMMONS WRIT	\$0.50	\$0.50	\$0.00
AUTOMATION FEE	\$5.00	\$5.00	\$0.00
JCS/ATJ FEE *	\$40.25	\$40.25	\$0.00
	\$103.25	\$103.25	\$0.00

\*\*\*\*\*

End of Case Information

## Supreme Court of Pennsylvania

Court of Common Pleas  
Civil Cover Sheet

Cambria

County

For Prothonotary Use Only:

Docket No.

2019-2921

 FILED FOR RECORD  
 2019 JUN 19 AM 9 16  
 PROTHONOTARY  
 COUNTY, PA

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A

## Commencement of Action:

- ☐ Complaint    ☒ Writ of Summons    ☐ Petition  
☐ Transfer from Another Jurisdiction    ☐ Declaration of Taking

 Lead Plaintiff's Name:  
 Danny David

 Lead Defendant's Name:  
 The Pennsylvania State University

 Are money damages requested? ☒ Yes    ☐ No

 Dollar Amount Requested:    ☐ within arbitration limits  
 (check one)    ☐ outside arbitration limits

 Is this a Class Action Suit?    ☐ Yes    ☒ No

 Is this an MDJ Appeal?    ☐ Yes    ☒ No

Name of Plaintiff/Appellant's Attorney: Margaret S. Coleman, Esquire

☐ Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)

SECTION B

**Nature of the Case** Place an "X" to the left of the **ONE** case category that most accurately describes your **PRIMARY CASE**. If you are making more than one type of claim, check the one that you consider most important.

**TORT** (do not include Mass Tort)

- ☐ Intentional  
☐ Malicious Prosecution  
☐ Motor Vehicle  
☐ Nuisance  
☐ Premises Liability  
☐ Product Liability (does not include mass tort)  
☐ Slander/Libel/ Defamation  
☐ Other:

**MASS TORT**

- ☐ Asbestos  
☐ Tobacco  
☐ Toxic Tort - DES  
☐ Toxic Tort - Implant  
☐ Toxic Waste  
☐ Other:

**PROFESSIONAL LIABILITY**

- ☐ Dental  
☐ Legal  
☐ Medical  
☐ Other Professional:

**CONTRACT** (do not include Judgments)

- ☐ Buyer Plaintiff  
☐ Debt Collection: Credit Card  
☐ Debt Collection: Other  
  
☒ Employment Dispute:  
     Discrimination  
☐ Employment Dispute: Other  
  
☐ Other:

**REAL PROPERTY**

- ☐ Ejectment  
☐ Eminent Domain/Condemnation  
☐ Ground Rent  
☐ Landlord/Tenant Dispute  
☐ Mortgage Foreclosure: Residential  
☐ Mortgage Foreclosure: Commercial  
☐ Partition  
☐ Quiet Title  
☐ Other:

**CIVIL APPEALS**

- Administrative Agencies  
☐ Board of Assessment  
☐ Board of Elections  
☐ Dept. of Transportation  
☐ Statutory Appeal: Other  
  
☐ Zoning Board  
☐ Other:

**MISCELLANEOUS**

- ☐ Common Law/Statutory Arbitration  
☐ Declaratory Judgment  
☐ Mandamus  
☐ Non-Domestic Relations  
☐ Restraining Order  
☐ Quo Warranto  
☐ Replevin  
☐ Other:

## **NOTICE**

**Pennsylvania Rule of Civil Procedure 205.5. (Cover Sheet) provides, in part:**

**Rule 205.5. Cover Sheet**

(a)(1) This rule shall apply to all actions governed by the rules of civil procedure except the following:

- (i) actions pursuant to the Protection from Abuse Act, Rules 1901 et seq.
- (ii) actions for support, Rules 1910.1 et seq.
- (iii) actions for custody, partial custody and visitation of minor children, Rules 1915.1 et seq.
- (iv) actions for divorce or annulment of marriage, Rules 1920.1 et seq.
- (v) actions in domestic relations generally, including paternity actions, Rules 1930.1 et seq.
- (vi) voluntary mediation in custody actions, Rules 1940.1 et seq.

(2) At the commencement of any action, the party initiating the action shall complete the cover sheet set forth in subdivision (e) and file it with the prothonotary.

(b) The prothonotary shall not accept a filing commencing an action without a completed cover sheet.

(c) The prothonotary shall assist a party appearing pro se in the completion of the form.

(d) A judicial district which has implemented an electronic filing system pursuant to Rule 205.4 and has promulgated those procedures pursuant to Rule 239.9 shall be exempt from the provisions of this rule.

(e) The Court Administrator of Pennsylvania, in conjunction with the Civil Procedural Rules Committee, shall design and publish the cover sheet. The latest version of the form shall be published on the website of the Administrative Office of Pennsylvania Courts at [www.pacourts.us](http://www.pacourts.us).

IN THE COURT OF COMMON PLEAS OF CAMBRIA COUNTY, PENNSYLVANIA

DANNY DAVID,

Plaintiff,

v.

THE PENNSYLVANIA STATE  
UNIVERSITY;

Defendant.

CIVIL DIVISION

No. *2019-2921*

FILED FOR RECORD  
2019 JUN 19 AM 9:14  
PROTHONOTARY CAMBRIA  
COUNTY, PA

**PRAECIPE TO ISSUE WRIT OF  
SUMMONS**

Filed on Behalf of Plaintiff  
Danny David

Counsel of Record for this Party

Margaret S. Coleman, Esquire  
PA I. D. #200975

Law Office of Timothy P. O'Brien  
2103 Investment Building  
239 Fourth Avenue  
Pittsburgh, PA 15222  
(412) 232-4400

## IN THE COURT OF COMMON PLEAS OF CAMBRIA COUNTY, PENNSYLVANIA

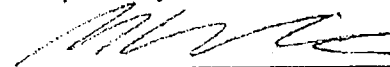
DANNY DAVID,	)	CIVIL DIVISION
	)	
Plaintiff,	)	No.
	)	
v.	)	
	)	
THE PENNSYLVANIA STATE	)	
UNIVERSITY,	)	
	)	
Defendant.	)	

**PRAECIPE TO ISSUE WRIT OF SUMMONS**

TO: The Prothonotary

Kindly issue a Writ of Summons in the above-captioned matter against the  
above-named defendant.

Respectfully submitted,




---

Margaret S. Coleman, Esquire  
PA I. D. #200975

Law Office of Timothy P. O'Brien  
2103 Investment Building  
239 Fourth Avenue  
Pittsburgh, PA 15219  
(412) 232-4400

Attorney for Plaintiff

**THE LAW OFFICES OF TIMOTHY P. O'BRIEN**  
**CIVIL RIGHTS | EMPLOYEE RIGHTS**

239 Fourth Avenue  
Investment Building, Suite 2103  
Pittsburgh, Pennsylvania 15222  
(412) 232-4400  
(412) 232-3730 (Fax)

**Timothy P. O'Brien**  
[tpob@obrien-law.net](mailto:tpob@obrien-law.net)

**Margaret Schuetz Coleman**  
[msc@obrienlawpgh.com](mailto:msc@obrienlawpgh.com)

**Alec B. Wright**  
[abw@obrienlawpgh.com](mailto:abw@obrienlawpgh.com)

June 13, 2019

Cambria County Prothonotary  
200 South Center St.  
Ebensburg, PA 15931

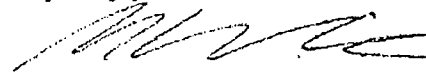
RE: Danny David v. The Pennsylvania State University

Dear Prothonotary:

Enclosed please find a Praecipe to Issue Writ of Summons in the above-referenced matter. Please return the issued writ to me in the enclosed self-addressed stamped envelope. I have also enclosed a check payable to the Cambria County Prothonotary in the amount of \$103.25.

Thank you for your assistance in this matter, and if you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,



Margaret S. Coleman

**Heather McDonald**

**From:** TrackingUpdates@fedex.com  
**Sent:** Friday, June 14, 2019 10:51 AM  
**To:** Heather McDonald  
**Subject:** FedEx Shipment 775462193338 Delivered

## Your package has been delivered

Tracking # 775462193338

Ship date: Thu, 6/13/2019	Delivery date: Fri, 6/14/2019 10:45 am
Margaret S. Coleman PITTSBURGH, PA 15222 US	Prothonotary Camden County Prothonotary 200 South Center St. EBENSBURG, PA 15931 US

**Delivered**

### Shipment Facts

Our records indicate that the following package has been delivered.

<b>Tracking number:</b>	775462193338
<b>Status:</b>	Delivered: 06/14/2019 10:45 AM Signed for By: J.GMITTER
<b>Reference:</b>	Danny David
<b>Signed for by:</b>	J.GMITTER
<b>Delivery location:</b>	EBENSBURG, PA
<b>Delivered to:</b>	Receptionist/Front Desk
<b>Service type:</b>	FedEx Standard Overnight®
<b>Packaging type:</b>	FedEx® Envelope
<b>Number of pieces:</b>	1
<b>Weight:</b>	0.50 lb.
<b>Special handling/Services:</b>	Deliver Weekday
<b>Standard transit:</b>	6/14/2019 by 4:30 pm

 Please do not respond to this message. This email was sent from a restricted mailbox. This report was generated on approximately 9:50 AM EDT on 6/17/2019.

All weights are in pounds.

To track the latest status of your shipment, click on the tracking number above.



Standard transit time and time the package is scheduled to be delivered is based on the service selected. Standard shipping rates and restrictions may apply. Please see the FedEx Service Guide for terms and conditions of service, including the FedEx Money-Back Guarantee, or contact your local FedEx Customer Support representative.

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Thank you for your business.

**FAX COVER SHEET**

TO	
COMPANY	
FAX NUMBER	18144725632
FROM	Heather McDonald
DATE	2019-06-18 20:05:04 GMT
RE	Danny David v. The Pennsylvania State University

**COVER MESSAGE**

Good afternoon:

Attached is the Praecipe for Writ of Summons which was delivered to the Cambria County Prothonotary on Friday, 6/14/19. I am also attaching the Civil Cover Sheet and a signed copy of the Praecipe. Please let me know if you would like to me to send a signed Praecipe with an original signature via US mail.

I apologize for any inconvenience. Please let me know if you need anything further. You can reach me at the number below or via e-mail at [hjm@obrienlawpgh.com](mailto:hjm@obrienlawpgh.com).

Thanks,

Heather J. McDonald  
Paralegal/Administrative Assistant

**The Law Offices of Timothy P. O'Brien**  
239 Fourth Avenue  
Suite 2103, Investment Building  
Pittsburgh, PA 15222  
(412) 232-4400 – phone  
(412) 232-3730 – fax

## IN THE COURT OF COMMON PLEAS OF CAMBRIA COUNTY, PENNSYLVANIA

DANNY DAVID,	)	CIVIL DIVISION
	)	
Plaintiff,	)	No.
	)	
v.	)	
	)	
THE PENNSYLVANIA STATE	)	
UNIVERSITY;	)	
	)	
Defendant.	)	

**PRAECIPE TO ISSUE WRIT OF  
SUMMONS**

Filed on Behalf of Plaintiff  
Danny David

Counsel of Record for this Party

Margaret S. Coleman, Esquire  
PA I. D. #200975

Law Office of Timothy P. O'Brien  
2103 Investment Building  
239 Fourth Avenue  
Pittsburgh, PA 15222  
(412) 232-4400

## IN THE COURT OF COMMON PLEAS OF CAMBRIA COUNTY, PENNSYLVANIA

DANNY DAVID,	)	CIVIL DIVISION
	)	
Plaintiff,	)	No.
	)	
v.	)	
	)	
THE PENNSYLVANIA STATE	)	
UNIVERSITY,	)	
	)	
	)	
Defendant.	)	

**PRAECIPE TO ISSUE WRIT OF SUMMONS**

TO: The Prothonotary

Kindly issue a Writ of Summons in the above-captioned matter against the  
above-named defendant.

Respectfully submitted,

---

Margaret S. Coleman, Esquire  
PA I. D. #200975

Law Office of Timothy P. O'Brien  
2103 Investment Building  
239 Fourth Avenue  
Pittsburgh, PA 15219  
(412) 232-4400

Attorney for Plaintiff

FILED FOR RECORD  
2019 OCT 30 AM 9:30  
PROTHOTOPIRY CALBERIA  
COUNTY, PA

IN THE COURT OF COMMON PLEAS OF CAMBRIA COUNTY, PENNSYLVANIA

DANNY DAVID,	)	CIVIL DIVISION
	)	
Plaintiff,	)	No. 2019-02921
	)	
v.	)	
	)	
THE PENNSYLVANIA STATE	)	
UNIVERSITY,	)	
	)	
	)	
Defendant.	)	

**COMPLAINT IN CIVIL ACTION**

AND NOW COMES Plaintiff Danny David, by and through his attorneys, MARGARET S. COLEMAN and the LAW OFFICES OF TIMOTHY P. O'BRIEN and submits the following Complaint in Civil Action, and in support thereof avers as follows:

**I) INTRODUCTION**

1. The Plaintiff, Danny David, alleges that Defendant, Pennsylvania State University ("PSU") discriminated against him on the basis of his perceived disability in violation of section 504 of the Rehabilitation Act when it revoked his conditional offer of employment because of his visual color deficiency.

**II) JURISDICTION**

2. Jurisdiction in this Court is proper pursuant to Article V, Section 5 of the Pennsylvania Constitution.

**III) PARTIES**

3. Danny David is an adult individual who currently resides in Uniontown, Pennsylvania.

4. The Pennsylvania State University is a public university, a member of the Pennsylvania State System of Higher Education and receives federal financial assistance. PSU maintains a main campus in State College, Pennsylvania and satellite campuses in Fayette, Pennsylvania and Lamont Furnace, Pennsylvania. At all relevant times, PSU was acting by and through its duly authorized employees, agents and/or administrators, who at all relevant times were acting within the course and scope of their employment, under color of state law, and in accordance with PSU's policies, practices and customs.

#### **IV) FACTUAL ALLEGATIONS**

5. Danny David has over 20 years of employment as a law enforcement officer in the Commonwealth of Pennsylvania including nine years as a Municipal Police Officer, three and a half years as a Municipal Police Chief, one year as a Deputy Sheriff, six years as a State Constable, five years as a Hospital Police Officer, and five years as a School Police Officer.

6. At all relevant times Mr. David was employed as a Municipal Police Officer Education and Training Commission (MPOETC) certified School Police Officer and/or Private Police Officer (Act 501).

7. At all relevant times, Mr. David was employed as a PSU Public Safety Officer.

8. Danny David suffers from a color vision deficiency. This condition affects his ability to differentiate the colors red and green under some circumstances. It is often referred to as "colorblindness."

9. Color vision deficiency occurs in various degrees ranging from mild to severe. Mr. David's deficiency is mild.

10. Color vision deficiency such as Mr. David's can be ameliorated through the use of glasses or contact lenses.

11. Mr. David's color vision deficiency has never affected his ability to perform any of his duties as police officer during his 20-year career in law enforcement.

12. Although Mr. David had previously been certified as a municipal police officer by MPOETC, his certification became inactive in 2008. He took and passed the test to become recertified in 2017.

13. In or about 2016, Mr. David became employed by PSU as a Public Safety Officer.

14. On or about October 2017, Mr. David applied for a position as a PSU Police Officer.

15. The duties and responsibilities of a PSU Police Officer are substantially similar to the duties and responsibilities of a PSU Public Safety Officer except that Public Safety Officers lack arrest powers.

16. On June 22, 2018, Defendant provided Danny David with a conditional offer of employment as a PSU Police Officer. The conditional offer was signed by John Petrick, Director of Administration.

17. The offer of employment was conditioned on, *inter alia*, Mr. David's successful completion of "all medical requirements."

18. Pursuant to the conditional offer, Mr. David was required to submit to a medical examination by a physician selected by PSU.



19. He completed this examination in July of 2018.

20. The vision test performed by PSU's physician revealed Mr. David's color vision deficiency.

21. Sometime thereafter, in July of 2018, John Petrick informed Mr. David via telephone that his conditional offer of employment, which was to start August 6, 2018, was withdrawn due to the results of his vision test.

22. On or about August 17, 2018, Mr. David provided Petrick with a letter from his ophthalmologist, Dr. Aaron Sobol, stating that, "[Mr. David's] red/green color deficit, in my medical opinion, will not affect his ability to perform his duties at [sic] a Pennsylvania State Trooper or Municipal officer in Pennsylvania."

23. PSU did not reinstate Mr. David's conditional offer of employment.

24. Because PSU withdrew Mr. David's conditional offer of employment, it did not submit his application to MPOETC for approval, as required by state law. See 37 P. Code § 203.15.

25. PSU's decision to withdraw Mr. David's conditional offer of employment was not "job related and consistent with business necessity."

26. PSU had no basis to believe that Mr. David's color vision deficiency would impair his ability to perform the essential job functions of a PSU Police Officer.

27. PSU had no basis to believe that Mr. David's color vision deficiency would render him a direct threat.

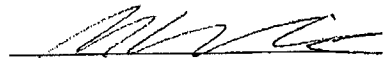
28. PSU never conducted an individualized assessment of Mr. David's present ability to safely perform the essential functions of a PSU Police Officer.

29. PSU never investigated whether the effects of Mr. David's color vision deficiency could be reduced or eliminated through a reasonable accommodation.

30. PSU's withdrawal of Mr. David's conditional offer of employment, and consequent failure to submit an application on his behalf to MPOETC violated Mr. David's rights under section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 701 et seq.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order 1) declaring that Penn State University's actions as described herein violated the Rehabilitation Act of 1973; 2) directing Penn State University to reinstate Mr. David's conditional offer of employment and submit his application for certification as a municipal police officer to the Municipal Police Officers Education and Training Commission; 3) awarding him monetary damages; 4) awarding him attorneys' fees and costs incurred in obtaining the relief requested herein; and 5) providing for such other relief as this Honorable Court deems just and proper.

Respectfully submitted,



Margaret S. Coleman, Esquire  
PA ID# 200975

Law Office of Timothy P. O'Brien  
Henry W. Oliver Building  
535 Smithfield Street, Suite 1025  
Pittsburgh, PA 15222  
(412) 232-4400

Attorney for Plaintiff

Oct 23 2019 12:52 HP Fax

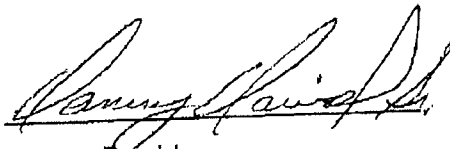
page 1

**VERIFICATION**

I, DANNY DAVID, have read the forgoing COMPLAINT IN CIVIL ACTION. The statements made herein are true and correct to the best of my knowledge, information and belief.

This verification is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments, I may be subject to criminal penalties.

Date: 10/23/2019

  
Danny David



McQuaide Blasko, Inc.  
811 University Drive, State College, PA 16801-6624  
814.238.4926 FAX 814.234.5620  
*Additional offices in Hershey, Hollidaysburg, and Williamsport*

November 12, 2019

**Via U.S. Mail**

Debbie Martella, Prothonotary  
Cambria County Court of Common Pleas  
200 South Center Street  
Ebensburg, PA 15931

**In re: Danny David v. The Pennsylvania State University, No. 2019-02921**

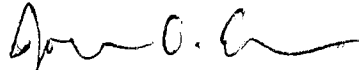
Dear Ms. Martella:

Enclosed please find my Praecipe for Entry of Appearance, Certificate of Compliance and Certificate of Service for filing on behalf of Defendant in the above-referenced matter.

Thank you for your attention to this matter.

Very truly yours,

McQUAIDE BLASKO

By:   
John A. Snyder

sap  
Enclosure  
cc/Enc.: Margaret S. Coleman, Esquire

THE COURT OF COMMON PLEAS  
CAMBRIA COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

DANNY DAVID,

Plaintiff,

v.

THE PENNSYLVANIA STATE  
UNIVERSITY,

Defendant.

:  
:  
: No. 2019-02921

:  
: Type of Pleading:  
: **Praecipe for Entry of Appearance**

:  
:  
: Type of Case: **Civil**

:  
: Filed on behalf of: **Defendant**

:  
:  
: Counsel of Record for this Party:  
: John A. Snyder, Esquire  
: Pa. I.D. No. 66295  
: [jasnyder@mqblaw.com](mailto:jasnyder@mqblaw.com)  
: McQUAIDE BLASKO, INC.  
: 811 University Drive  
: State College, PA 16801  
: Phone: (814) 238-4926  
: Fax: (814) 234-5620

IN THE COURT OF COMMON PLEAS  
CAMBRIA COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

DANNY DAVID,

Plaintiff,

v.

THE PENNSYLVANIA STATE  
UNIVERSITY,

Defendant.

:  
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No. 2019-02921  
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**PRAECIPE FOR ENTRY OF APPEARANCE**

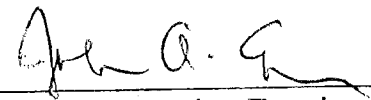
TO THE PROTHONOTARY:

Please enter my appearance as counsel for Defendant The Pennsylvania State University in the above-captioned matter.

McQUAIDE BLASKO, INC.

Dated: November 13, 2019

By: \_\_\_\_\_

  
John A. Snyder, Esquire  
Pa. I.D. No. 66295  
[jasnyder@mqblaw.com](mailto:jasnyder@mqblaw.com)  
811 University Drive  
State College, PA 16801  
Phone: (814) 238-4926

Attorneys for Defendant



IN THE COURT OF COMMON PLEAS  
CAMBRIA COUNTY, PENNSYLVANIA  
CIVIL ACTION – LAW

DANNY DAVID,

Plaintiff,

v.

THE PENNSYLVANIA STATE  
UNIVERSITY,

Defendant.

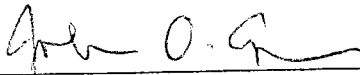
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No. 2019-02921  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of my Praecept for Entry of Appearance on behalf of Defendant in the above-captioned matter was served via U.S. Mail, on this 13 day of November, 2019, to the attorneys/parties of record:

Margaret S. Coleman, Esquire  
Law Offices of Timothy P. O'Brien  
Henry W. Oliver Building  
535 Smithfield Street, Suite 1025  
Pittsburgh, PA 15222  
(412) 232-4400  
[mse@obrienlawpgh.com](mailto:mse@obrienlawpgh.com)

McQUAIDE BLASKO, INC.

By: 

John A. Snyder, Esquire  
Pa. I.D. No. 66295  
[jasnyder@mqblaw.com](mailto:jasnyder@mqblaw.com)  
811 University Drive  
State College, PA 16801  
Phone: (814) 238-4926

Attorneys for Defendant